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15 MS. PALMER: That's okay. Good afternoon.
16 I'm Betsy Palmer with NAC International. NAC
17 International welcomes the opportunity to comment
18 on DOE's Yucca Mountain Draft EIS affirming the
19 scientific and societal benefits associated with
20 the Yucca Mountain repository. As the United
21 States' leading provider of spent nuclear fuel
22 management technology and transportation services,
23 we're well positioned to comment on the DEIS. NAC
24 appreciates DOE's concern for assuring safe and
25 secure transportation of nuclear materials not

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1 only on Georgia's highways but all roads on the
2 transportation corridor to Yucca Mountain. Based
1 3 on our 30 years' experience in this arena [we're
4 confident that nuclear materials can be
5 transported to Yucca Mountain in a manner that
6 fully ensures public health and safety of the
7 citizens of the United States.]

8 Currently there is in place a comprehensive
9 regulatory framework that governs the nuclear fuel
10 transportation system in this country. This
11 framework has enabled the United States and
12 companies like NAC International to create an
13 outstanding nuclear materials transportation
14 safety record, a record that has never resulted in
15 any public radiological exposure. NAC offers this
16 perspective based on its experience as the owner
17 and operator of the nation's largest fleet of
18 spent-fuel and high-level-waste containers and
19 equipment. NAC has safely transported the majority
20 of spent-nuclear-fuel shipment in this country in
21 the past 15 years. Our domestic and international
22 experience includes more than 3,250 accident-free
23 shipments totaling more than six million miles.
24 Our casks have been utilized in more than 65
25 nuclear facilities worldwide. NAC's transport

1 fleet includes 12 systems with three different
2 designs. In addition, we have eight different
3 storage systems that are approved for use or in
4 the process of regulatory approval. Our spent-
5 fuel management systems possess certificate of
6 compliance from the NRC attesting to their
7 durability, strength and safety. Further, NAC
8 owns the only U.S.-licensed container by NRC for
9 international use. Among others, our
10 transportation systems are licensed to safely
11 transport fuel from commercial electric power
12 reactors, research reactors at laboratories and
13 universities around the world as well as transport
14 fuel that requires special handling.

15 NAC has played an active role in supporting
16 state, federal and international regulators in
17 developing policies and procedures guiding the
18 safe and secure transport of nuclear materials,
19 including transportation and fuel handling plants
20 that are currently being developed today by DOE
21 for Yucca Mountain. Our technology team and
22 transportation safety experts have shaped
23 industry-wide standards for both spent-fuel
24 management systems, licensing and transport.

25 NAC's recent fuel management campaigns

1 include shipments here in Georgia, between various
2 DOE facilities nationwide and through the cities
3 of New York, New Mexico, South Carolina, Idaho and
4 California in support of DOE's foreign research
5 reactor fuel return program. Our recent
6 international shipments, all of which were also
7 conducted incident free, occurred in Korea,
8 Thailand, Indonesia and eight countries in Europe.
9 Each of these fuel movements was conducted under
10 the guidance of domestic and international
11 inspectors and regulations. These fuel
12 stabilization and shipment campaigns stand as
13 prime examples of how to safely and securely
14 transport nuclear material, and have contributed
15 significantly to the U.S. government's
16 nonproliferation initiatives.

17 Each of these campaigns complied with a
18 comprehensive regulatory framework. Among others,
19 we follow regulations that are set forth in the
20 Code of Federal Regulations, chapter 10 and 49;
21 with the federal motor carrier safety regulations;
22 the federal railroad association regulations; the
23 Association of American Railroads guidance; the
24 American National Standards Institute standards;
25 existing state regulations governing the transport

1 of hazardous materials in all 50 states; the IAEA
2 safety series six, seven, nine, thirty-seven and
3 one twelve; the United Nations ADR agreement,
4 which concerns the international carriage of
5 dangerous goods; the International Air Transport
6 Association's dangerous-goods regulations; and the
7 international maritime dangerous-goods codes.

8 In conclusion, this record supports the fact
9 that nuclear materials are being transported
10 safely and securely around the world on other
2 11 nations' highways and railways. [Moreover, a
12 strong regulatory framework is in place for Yucca
13 Mountain-related transportation activities. We
14 strongly support DOE's efforts to move forward
15 with the Yucca Mountain repository to meet the
16 urgent need to transport spent fuel from Georgia
17 and throughout the U.S. to a safe, secure and
18 long-term disposal facility.] Thank you.

19 MS. SWEENEY: Thank you.

20 MR. LAWSON: Thank you very much. Our next
21 speaker is Susan Clark. She'll be followed by
22 Lauren McDonald and Chuck Wilson.